

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RAMONA THURMAN BIVINS,

Plaintiff,

V.

FELICIA FRANKLIN, in her individual
and official capacities;

ALIEKA ANDERSON, in her individual
and official capacities;

GAIL HAMBRICK, in her individual
and official capacities; and

CLAYTON COUNTY, GEORGIA,

Defendants.

CIVIL ACTION FILE NO.:
1:22-cv-04149-WMR

**DEFENDANT ALIEKA ANDERSON’S CONSENT MOTION AND
PROPOSED ORDER FOR AN EXTENSION OF TIME TO FILE REPLY IN
SUPPORT OF HER MOTION FOR JUDGMENT ON THE PLEADINGS**

COMES NOW, Defendant ALEIKA ANDERSON (hereinafter “Anderson”),
by and through her undersigned counsel, and hereby files this Consent Motion, and
moves this Court for an Order extending the time period for their Reply in Support
of her Motion for Judgment on the Pleadings [Doc. 29], through and including
February 3, 2023, showing the Court as follows:

On October 17, 2022, Plaintiff filed her initial Complaint for Damages and Injunctive Relief against Defendants Felicia Franklin (“Franklin”), in her individual and official capacities, Anderson in her individual

and official capacities, Gail Hambrick, in her individual and official capacities, and Clayton County, Georgia. [Doc. 1]. In turn, on November 22, 2022, Anderson filed her Answer to Plaintiff's Complaint. [Doc. 19]. Then, on December 23, 2022, Anderson filed a motion for judgment on the pleadings. [Doc. 29] On January 12, 2023, Plaintiff filed her response brief in opposition to Anderson's motion. [Doc. 34]. Anderson's reply brief is currently due on or before January 27, 2023.

Counsel for Anderson now respectfully requests a seven (7) day extension on the due date -- until February 3, 2023 -- for the reply brief. Counsel for Anderson has deadlines in other cases around January 27, 2023, and has conferred with counsel for Plaintiff regarding the 7-day extension. Counsel for Plaintiff has agreed to the extension. The requested extension will not prejudice any party and is sought in good faith and not for the purposes of delay or any other purpose contrary to the Federal Rules of Civil Procedure and the Local Rules of this Court.

WHEREFORE, Anderson respectfully requests the Court grant her Motion for an Extension of Time to file the Reply in Support of their Motion for Judgment on the Pleadings, extending the deadline to February 3, 2023.

A proposed Order is attached herewith.

Respectfully submitted this 23th day of January, 2023.

**GREGORY, DOYLE,
CALHOUN, & ROGERS, LLC**
Attorneys for Defendant Anderson

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CERTIFICATION OF COUNSEL

The undersigned pursuant to this Court's Local Rules hereby certifies that this document has been prepared with Times New Roman 14 point.

This 23th day of January, 2023.

**GREGORY, DOYLE,
CALHOUN, & ROGERS, LLC**
Attorneys for Defendant Anderson

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RAMONA THURMAN BIVINS,)	
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Plaintiff,)	
)	
v.)	
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FELICIA FRANKLIN, in her individual)	CIVIL ACTION FILE NO.:
and official capacities;)	1:22-cv-04149-WMR
ALIEKA ANDERSON, in her individual)	
and official capacities;)	
GAIL HAMBRICK, in her individual)	
and official capacities; and)	
CLAYTON COUNTY, GEORGIA,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2023, I electronically filed **DEFENDANT ALIEKA ANDERSON’S CONSENT MOTION AND PROPOSED ORDER FOR AN EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF HER MOTION FOR JUDGMENT ON THE PLEADINGS** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

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and official capacities; and)	
CLAYTON COUNTY, GEORGIA,)	
)	
Defendants.)	

[PROPOSED] ORDER

This matter is before the Court on Defendant Anderson's Consent Motion for an Extension of Time to File Reply to in Support of the Motion for Judgment on the Pleadings. Plaintiff having consented to it, and for good cause shown, the Motion is GRANTED. Defendant's deadline to file her reply in support of her Motion for Judgment on the Pleadings [Doc. 29] is extended to February 3, 2023.

IT IS SO ORDERED, this ____ day of January, 2023.

HONORABLE WILLIAM RAY
UNITED STATES JUDGE
NORTHERN DISTRICT OF GEORGIA

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